



Entergy Operations, Inc.  
1340 Echelon Parkway  
Jackson, Mississippi 39213-8298  
Tel 601-368-5758

F. G. Burford  
Acting Director  
Nuclear Safety & Licensing

CNRO-2004-00028

May 3, 2004

U. S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
Washington, DC 20555-0001

SUBJECT: Request for Alternatives ANO1-R&R-005 -  
Proposed Alternative to ASME Weld Repair Requirements for Repairs  
Performed on Reactor Vessel Head Penetration Nozzles

Arkansas Nuclear One, Unit 1  
Docket No. 50-313  
License No. DPR-51

REFERENCE: Entergy Operations, Inc. letter CNRO-2004-00023 to the NRC dated  
April 12, 2004

Dear Sir or Madam:

In the referenced letter, Entergy Operations, Inc., (Entergy) transmitted to the NRC staff ANO Calculation 86-E-0074-154, which supports Entergy's Request for Alternative ANO1-R&R-005. (This calculation was provided to Entergy by Framatome-ANP, Inc. as Framatome Document 32-5012424.)

Framatome-ANP, Inc., the owner of Framatome Document 32-5012424, considers information contained in this document to be proprietary and confidential pursuant to 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4). As such, Framatome has requested that it be withheld from public disclosure. Provided in the enclosure to this letter is the correct affidavit supporting this request. This affidavit replaces the one transmitted to the staff via the referenced letter.

If the staff has any questions regarding the proprietary designation of Framatome Document 32-5012424, please contact Mr. James Mallay, Director, Regulatory Affairs for Framatome at the following address and/or telephone number:

Framatome-ANP, Inc.  
P. O. Box 10935  
3315 Old Forest Road  
Lynchburg, VA 24506-0935  
Telephone # (434) 832-3000

*EA0417*

Should you have any questions regarding this letter, please contact Guy Davant at (601) 368-5756.

This letter contains no commitments.

Very truly yours,



FGB/GHD/ghd

Enclosure: Affidavit for Withholding Information from Public Disclosure

cc: Mr. W. A. Eaton (ECH) (w/o Enclosure)  
Mr. J. S. Forbes (ANO) (w/o Enclosure)

Dr. Bruce. S. Mallett  
Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

NRC Senior Resident Inspector  
Arkansas Nuclear One  
P. O. Box 310  
London, AR 72847

U. S. Nuclear Regulatory Commission  
Attn: Mr. T. W. Alexion  
MS O-7 D1  
Washington, DC 20555-0001

**ENCLOSURE**

**CNRO-2004-00028**

**AFFIDAVIT FOR WITHHOLDING INFORMATION  
FROM PUBLIC DISCLOSURE**



April 2, 2004  
FANP-04-1080

Mr. Guy A. Davant  
Entergy Operations, Inc.  
P.O. Box 31995  
Jackson, MS 39286-1995

Subject: AREVA Document 32-5012424-10, "CRDM Temper Bead Base Weld Analysis"

Reference: Entergy Operations Calculation No. 86-E-0074-154. Rev. 0

Dear Mr. Davant,

Entergy Operation, Inc. requested approval from Framatome ANP, Inc. (FANP) to transmit the subject document under the referenced Entergy Calculation to the NRC. The submittal is based upon a NRC request in support of ANO Relief Request for RV Head CRDM Repairs at ANO-1.

FANP, by this letter approves the submittal of the subject document as noted in the referenced Entergy Calculation in support of the FANP IDTB repair process.

FANP maintains the proprietary status of the document and has enclosed the applicable affidavit for Entergy use.

If there are questions regarding this release, please contact me at (434) 832-3767.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephen G. Son'.

Stephen G. Son  
Project Manager

c: J. Smith, ANO

**FRAMATOME ANP, INC.**

P.O. Box 10935, 3315 Old Forest Road, Lynchburg, VA 24506-0935  
Tel. : (434) 832-3000 - Fax : (434) 832-0622

## AFFIDAVIT

COMMONWEALTH OF VIRGINIA    )  
  ) ss.  
CITY OF LYNCHBURG            )

1. My name is James F. Mallay. I am Director, Regulatory Affairs, for Framatome ANP ("FANP"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by FANP to determine whether certain FANP information is proprietary. I am familiar with the policies established by FANP to ensure the proper application of these criteria.

3. I am familiar with the information contained in the FANP calculation summary sheet 32-5012424-10, "CRDM Temper Bead Bore Weld Analysis." This calculation file is being submitted by Entergy Operations to the NRC as part of Arkansas Nuclear One calculation number 86-E-0074-154 concerning licensed activities at Arkansas Nuclear One, Unit 1. The FANP calculation file is referred to herein as "Document." Information contained in this Document has been classified by FANP as proprietary in accordance with the policies established by FANP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by FANP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure.

6. The following criteria are customarily applied by FANP to determine whether information should be classified as proprietary:

- (a) The information reveals details of FANP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FANP, would be helpful to competitors to FANP, and would likely cause substantial harm to the competitive position of FANP.

7. In accordance with FANP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside FANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge,  
information, and belief.

James P. Mallory

SUBSCRIBED before me this 2nd  
day of April, 2004.

Ella F. Carr-Payne

Ella F. Carr-Payne  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/05

